

Exhibit G



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 16, 2020

VIA EMAIL

Lorin Reisner, Esq.
Richard Tarlowe, Esq.
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1285 Avenue of the Americas
New York, NY 10019

Re: United States v. Neil Cole, 19 Cr. 869 (ER)

Dear Counsel:

We write to advise you that we intend to call Carina Chambarry, a financial economist at the Securities and Exchange Commission ("SEC") Division of Economic and Risk Analysis ("DERA"), to testify. Although Ms. Chambarry's testimony is most accurately classified as summary testimony rather than expert testimony, the Government makes this disclosure out of an abundance of caution.

Ms. Chambarry will provide summary testimony and publish summary charts addressing: (1) the amounts and percentages by which Iconix's revenue, EBITDA, and earnings per share ("EPS") were inflated during the periods at issue in the Indictment, based upon assumptions supplied by the Government about the amounts by which revenue was inflated, and whether Iconix would have reached its revenue, EBITDA, and EPS guidance and consensus absent those inflations; and (2) the profits realized from Neil Cole's sale of Iconix stock in or about October 2014.

We do not intend to elicit any opinion testimony from Ms. Chambarry. Ms. Chambarry was not a part of the investigations conducted by the Government or the SEC. She has not received or reviewed the Indictment or any facts or evidence concerning the transactions at issue in the Indictment, with the exception of publicly available SEC filings.

Ms. Chambarry's curriculum vitae is enclosed.

Very truly yours,

GEOFFREY S. BERMAN
United States Attorney

By: /s/
Edward Imperatore/Scott Hartman/Jared Lenow
Assistant United States Attorneys
(212) 637-2327 / 2527 /1068